

September 12, 2003

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station
Boston, MA 02110

Re: D.T.E. 01-106 – Low-Income Discount Rate Enrollment

Dear Secretary Cottrell:

In response to the Department of Telecommunications and Energy's (the "Department") September 2, 2003 Hearing Officer Memorandum, the New England Gas Company (the "Company") hereby files brief comments in support of NSTAR's August 28, 2003 Motion for Reconsideration (In Part), or in the Alternative, Motion for Clarification (the "NSTAR Motion") in the above-referenced proceeding. The Company prefaces its comments by reiterating its support of the Department's efforts to facilitate the enrollment of eligible customers on utility company low-income discount rates. The Company has also previously expressed its support of the Department's specific recommendation, as referenced in its August 8, 2003 Order in this proceeding, to accomplish this goal by improving communications between the utility companies and governmental agencies in order to better identify those utility company customers that are also recipients of income-eligible governmental programs.

The Company's support of the NSTAR Motion emanates from the ambiguities in the Department's August 8 Order regarding implementation of electronic data sharing between the utility companies and the Executive Office of Health and Human Services ("EOHHS"). In particular, because of its small size, New England Gas Company is acutely sensitive to regulatory policies that may result in increased costs to the Company and its customers. Accordingly, the Company supports the comments of other participants in this proceeding which have requested that the Department implement steps that will be completed prior to the commencement of the new procedures, including the development of a mechanism to account for the rate impacts of this change. The Company believes that such findings should be made by the Department prior to directing utility companies to implement a data-sharing policy with EOHHS. In addition, the Company believes that the EOHHS must itself be ready and able to match utility customer data for purposes of identifying eligible low-income discount

customers prior to requiring the companies to send such data to the agency. Accordingly, the Company supports clarifying the Department's August 8 Order to state that any electronic data-sharing should only commence after the agency has received permission from its clients to inform the utility companies of such clients' participation in an EOHHS-administered program.

New England Gas looks forward to discussing these issues further with the Department and interested parties during Phase II of this proceeding. Should you have questions regarding these comments, please feel free to contact me. Thank you for your attention to this matter.

Sincerely,



Sharon Partridge
Vice President - Finance

cc: Commissioner Deirdre Manning, Department of Telecommunications and Energy
Michael Killion, Esq., Hearing Officer
Peter Czekanski, Director - Pricing, New England Gas Company
Kerry Britland, Manager - Regulatory Relations, New England Gas Company
Andrew Kaplan, Esq.
Service List